EPA United States Environmental Protection Agency

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105

Inspection Date(s):	August 21, 2019	
Time:	**Entry:** 9:00 am	**Exit:** 10:30 am
Media:	Water	
Regulatory Program(s)	Clean Water Act NPDES	
Company Name:	Dos Cuadras Offshore Resources, LLC (DCOR)	
Facility or Site Name:	Platform Habitat	
Facility/Site Physical Location:	Platform Habitat, Santa Barbara Channel, Pacific Ocean Lease OCS-P-0234	
Geographic Coordinates:	34°17'12.31"N, 119°35'19.23"W	
Mailing address:	290 Maple Court, Suite 290 Ventura, CA 93003	
Facility/Site Contact:	Jay Rao	**Title**: Environmental Engineer
	Phone: 805-535-2078	**Email**: jrao@dcorllc.com
Facility/Site Identifier:	NPDES Permits CAG280000 and CAF001304	
NAICS:	211111 - Crude petroleum and natural gas extraction	
SIC:	1311	

Facility/Site Personnel Participating in Inspection:

Name	Affiliation	Title	Email
Jay Rao	DCOR	Environmental Engineer	jrao@dcorllc.com
Jacob Ruth	DCOR	Lead Operator	habitatuser@dcorllc.com

EPA Inspector(s):

Adam Howell	US EPA	Environmental Engineer	Howell.Adam@epa.gov
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	ERIC MAGNAN Digitally signed by ERIC MAGNAN Date: 2019.10.18 18:10:16 -07'00'	**Date:**

SECTION I – INTRODUCTION

I.1 Purpose of the Inspection

On August 21, 2019, Adam Howell and Michael Weiss from the U.S. EPA Region 9 Enforcement Division (hereafter, we or inspection team) conducted a Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) inspection of the DCOR, LLC (DCOR or Discharger) – Platform Habitat (hereafter, Facility or Platform) offshore oil and gas platform. The purpose of the inspection was to evaluate compliance with the requirements of the EPA Region 9 NPDES Permit Nos. CAG280000 and CAF001304 (hereafter, Permit).

During the inspection we evaluated the accuracy and reliability of the Discharger's self-monitoring and reporting program and the Facility onsite generated waste streams, treatment processes, and discharges to the Pacific Ocean. The announced inspection consisted of two parts: a records review and a general Facility walk through. The onsite Facility Representatives were Jay Rao (Environmental Engineer, DCOR), and Jacob Ruth (Lead Operator). Upon arriving at the Platform on August 21, 2019, we met with the Facility Representatives, and presented our CWA credentials and explained the purpose of the inspection.

SECTION II – FACILITY / SITE DESCRIPTION

II.1 Facility Description

Platform Habitat is located in the Santa Barbara Channel and produces oil and gas from the Pitas Point Field (Lease OCS-P-0234). The Platform was first installed in August 1979 and began production in October 1981. Platform Habitat is approximately 7.8 miles from land, has 24 well slots, and is at a water depth of 290 feet. As of October 1, 2017, Platform Henry had a cumulative oil production of 209,000 bbls (barrels) and cumulative gas production of 232,734,000 mcf (thousand cubic feet).

At the time of the inspection, the Facility had not been in productions since 2016. The platform is currently used primarily to house staff doing work on other platforms. Facility Representatives stated that at the time of the inspection, the following NPDES discharges occur or may occur from the Facility:

- Deck Drainage (Discharge 004)
- Sanitary and Domestic Wastes (Discharge 005)
- Desalination Unit Wastes (Discharge 007)
- Fire Control System Water (Discharge 008)

II.2 Wastewater Sources

Note the discharge number (i.e., Discharge 002) referenced throughout this report refers to the type of wastewater discharged at the corresponding outfall point as designated in the Permit. A general description of the process train(s) for each of the above-mentioned discharges is described below:

Deck drainage (washdown, rainwater, drip pan and work area drains – Discharge 004) is collected throughout the platform via floor drains into a sump tank on the Subdeck. The top most platform level (Drill Deck) and next level (Production Deck) are enclosed with berms and floor trenches that flow to the sump tank on the Subdeck. The sump tank contains baffles and operates as an oil water separator. Facility Representatives stated that the deck drainage is discharged directly from the sump to the ocean through a piling and residual oil is pumped to the drilling deck.

Sanitary Wastewater (Discharge 005) is treated onsite at the Facility with a redFox environmental marine sanitation device (MSD) which is United States Coast Guard (USCG) approved (Photograph 1). The treated water is discharged (Discharge 005) to the Pacific Ocean via a pipe (Photograph 2). The onsite Facility representatives stated that the daily discharge water flow rate is estimated based on the number of people on the platform and the time spent per person. The MSD unit is sized for a maximum of 500 gallons per day (gpd).

Desalination (i.e., reverse osmosis) unit wastewater (Discharge 007) is generated during the process of creating freshwater from saltwater. According to onsite Facility representatives, the desalination unit was not working at the time of the inspection. A new unit was to be installed soon and will only provide water to sinks and showers at the Facility. RO reject water will be discharged to the Pacific Ocean via a pipe (Photograph 3).

Fire control system water (seawater released during training, testing, and maintenance of fire protection equipment – Discharge 008) is composed of pure seawater that is constantly circulating throughout the Platform. The Fire control water is discharged through the pipes in (Photograph 4) without treatment.

II.3 Wastewater Treatment

Sanitary wastewater (Discharge 005) is [OBJ]treated onsite at the Facility. Discharge 005 is treated via a redFox MSD (Photograph 1). The self-contained treatment system is composed of an aeration chamber, flocculation, solids settling, media filtration, and disinfection. The Platform chlorinates the treated effluent and checks the chlorine residual daily. The MSD is serviced annually by a contractor. The MSD was shutdown from January 2019 – June 2019 when the platform was unoccupied.

Domestic and Sanitary Wastes (Discharge 005), Footnote 2, of the Permit states "any facility which properly operates and maintains a marine sanitation device (MSD) that was certified by the United States Coast Guard (USCG) under Section 312 of the Act shall be deemed to be in compliance with permit limitations for sanitary wastes and the requirements for total residual chlorine do not apply."

II.4 Compliance History

Discharge Monitoring Reports (DMRs) reviewed by the inspection team did not indicate any reported effluent violations during the period of review (July 2016 through July 2019). During that time period deck drainage (Discharge 004) was reported January 2017 – November 2017 and January 2018 – March 2018. All sources of wastewater discharge (sanitary, desalination, and fire control system) were in compliance.

SECTION III – OBSERVATIONS

- During the Facility walk through, we observed one unlabeled 55-gallon drum (Photograph 5) on the Drill Deck and two unlabeled 55-gallon drums (Photographs 6 & 7) on the production deck. Mr. Ruth stated that samples from two of these drums were at the lab awaiting analyses to determine proper disposal methods. He told us the remaining drum was to be sampled for analysis in the near future.

- The NPDES permit, daily reports, and DMRs were all well organized and readily available on an electronic share drive accessible on the Platform.

- The platform had significant rust and corrosion and in places the floors seemed unsound.

SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

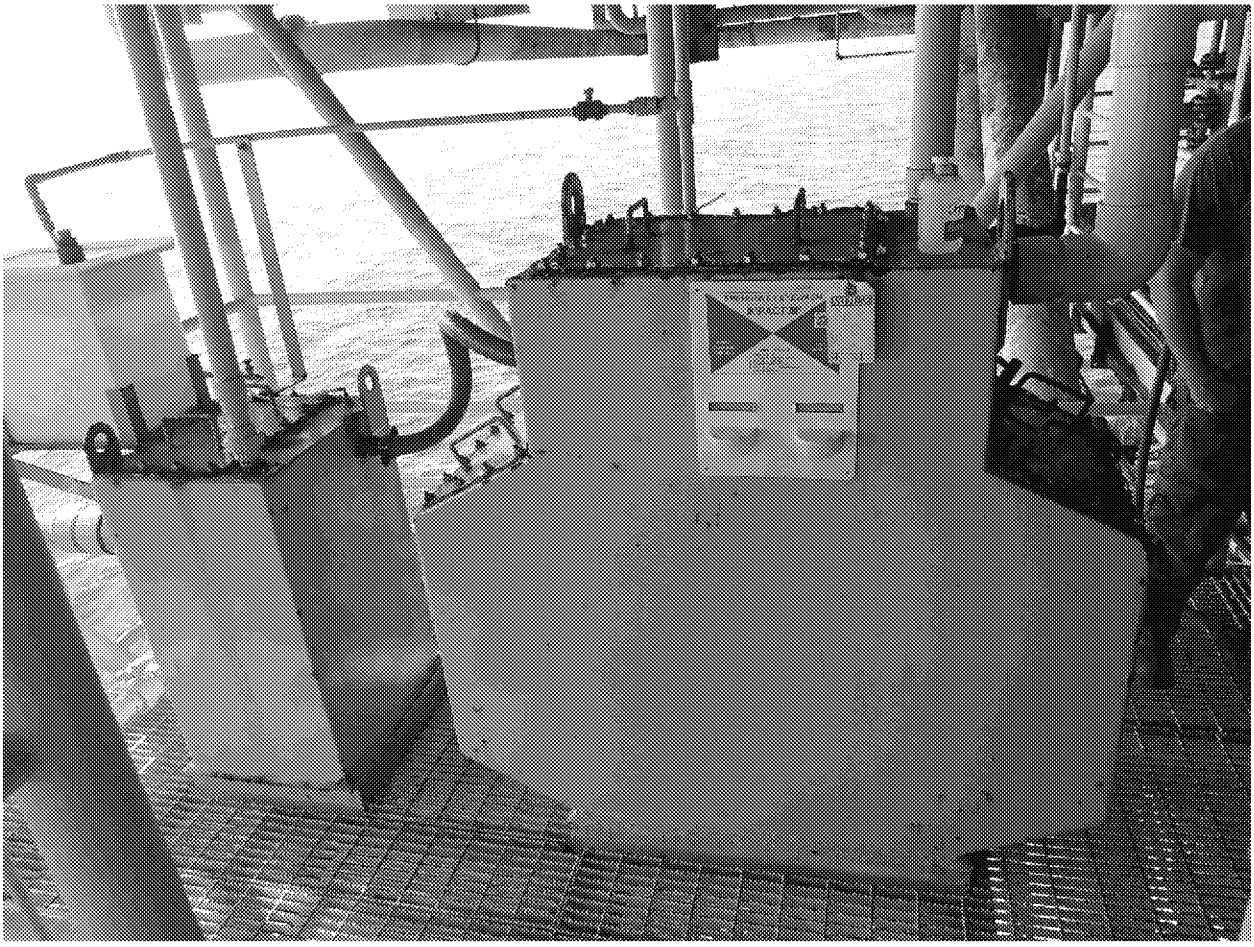
1. While a certain amount of rust and corrosion is to be expected in a harsh marine environment, the Facility should ensure that the corrosion does not negatively impact that operations or safety of the Platform or its ability to comply with the Clean Water Act.

2. The Facility needs to follow through on proper disposal of unlabeled chemicals.

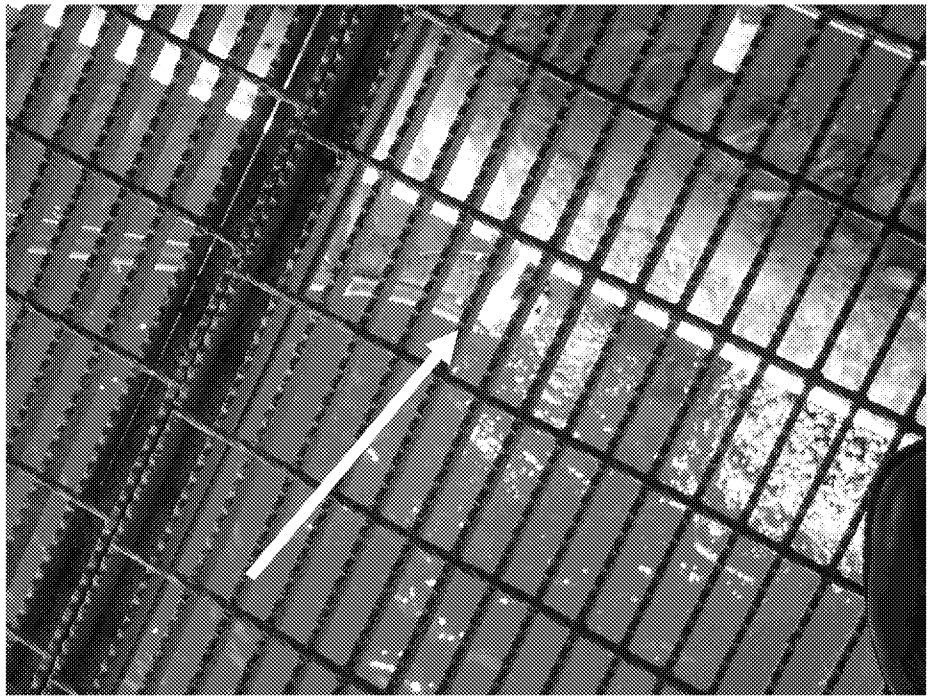
APPENDICES

Appendix 1 – Photograph Log

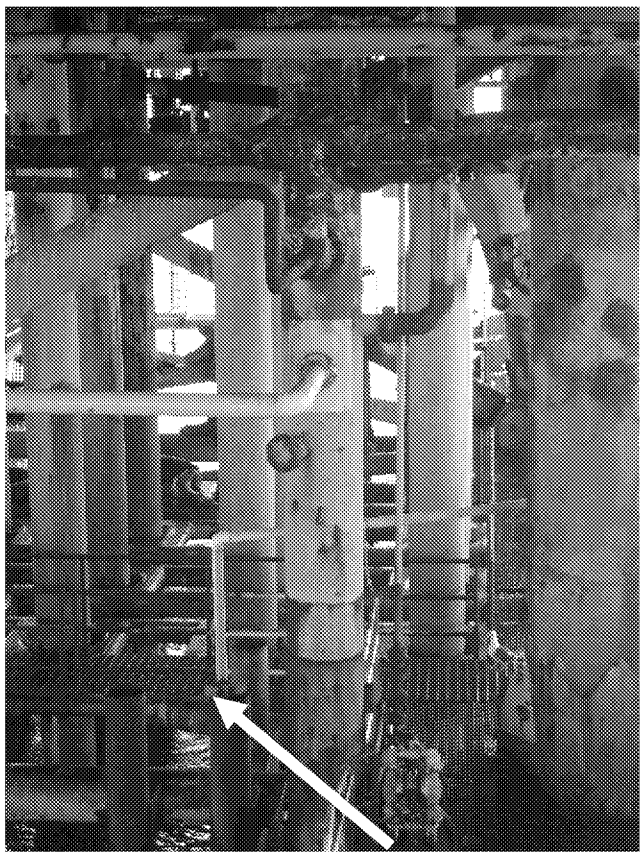
The photographs were taken during the inspection by Michael Weiss using an Olympus Tough TG-5 Digital Camera. Original copies of the photos are maintained by EPA Region 9.



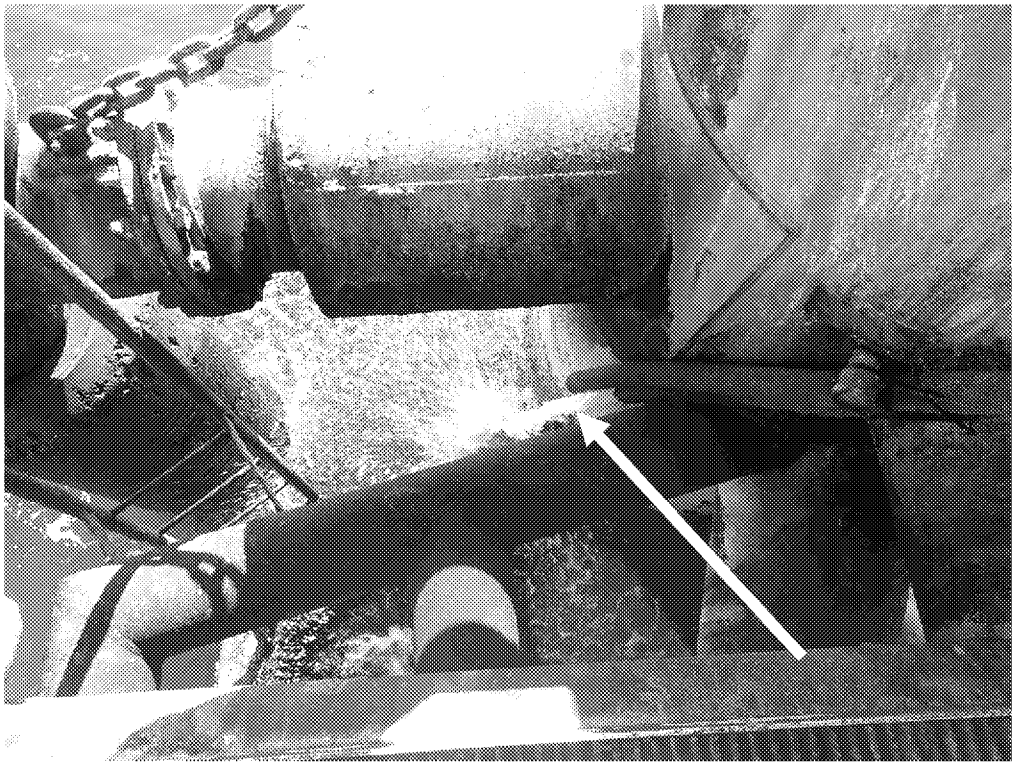
Photograph 1: RedFox Marine Sanitation Device



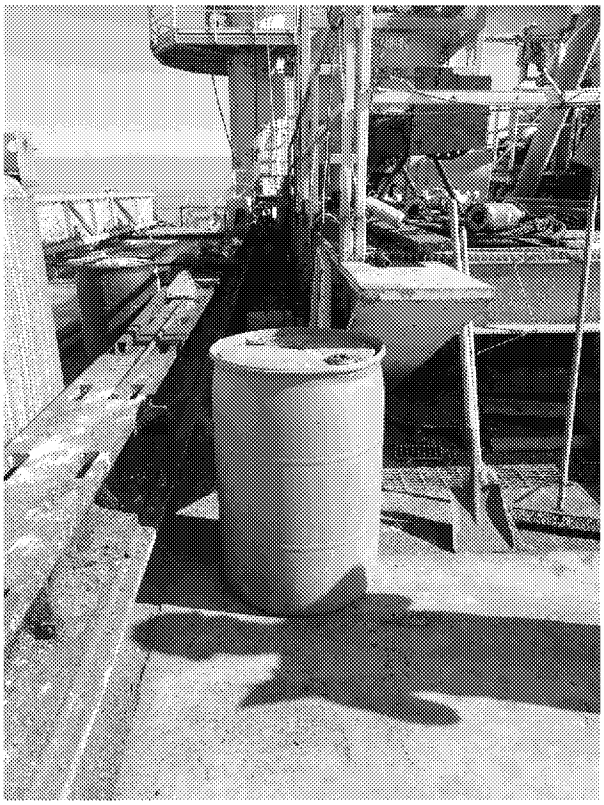
Photograph 2: Marine Sanitation Device discharge location.



Photograph 3:RO Reject water discharge pipe

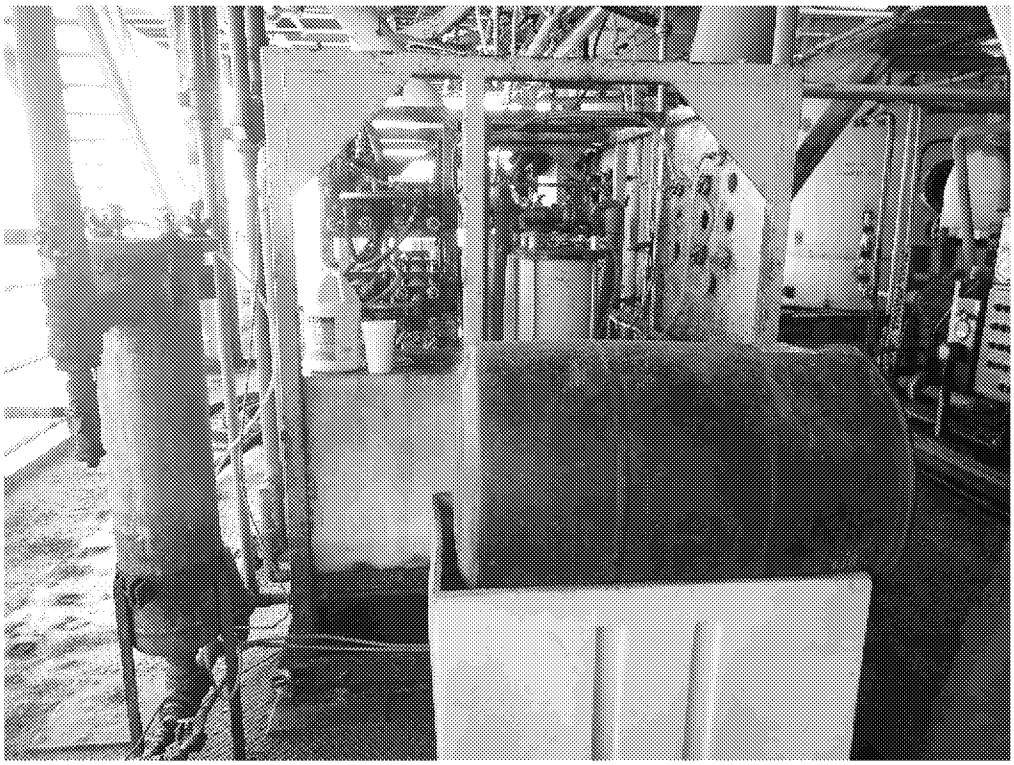


Photograph 4:Fire water discharge.



Photograph 5 : Unlabeled drum on drill deck.

Photograph 6 : Unlabeled drum on production deck.



Photograph 7: Unlabeled drum on production deck.

Appendix 2 – Example of a daily report from the Facility

DCOR, LLC
Daily Recap Report
Habitat 8/17/2019

Production Data

Well Test Data

Well Name	Gross	Water Cut	Net Oil	Water	Total Gas	Valid Test

Down Time

WellName	Reason	Time Off	Time On	HoursDowi	Notes

Inactive Wells

A-01, A-02, A-03, A-04L, A-04U, A-05, A-06, A-07, A-08L, A-08S, A-09, A-10, A-11, A-12, A-13, A-15, A-16, A-17, A-18, A-19, A-20, A-21,

Misc. Data

Monthly Cum Sales Gas	0 MCF
Monthly Cum Cond Inj	0 bbls
Monthly Cum Prod Wtr	0 bbls
Monthly Cum Fuel Gas	0 Mcf
Monthly Cond Mtr Open	0 bbls
Daily Cond Mtr Close	0 bbls
A-17 Daily Condensate Injection	0 Bbl
Water Dew Point Reading	0 Degrees
Gas Line Temperature	0 Degrees
Test Sep. A	0 Psi
Test Sep. B	0 Psi
Gas Line Pressure	127 PSI
Glycol Fuel Gas	0 MCF
Glycol operating Hrs.	0 hrs
Cooper 1st Stage Suction	0 PSI
Cooper 1st Stage Suction	0 Degrees
Cooper 1st Stage Suction Rate.	0 MCF
Cooper 1st Stage Discharge	0 PSI
Cooper 1st Stage Discharge	0 Degrees
Cooper 2nd Stage Discharge	0 PSI
Cooper 2nd Stage discharge.	0 Degrees.
Cooper inter-cooler out temp.	0 degrees
Cooper Engine Oil	0 Degrees
Cooper Engine	0 RPMs
Cooper Operating	0 Hrs
Cooper Fuel Gas Usage	0 MCF
RO Daily Mtr. Read.	0 gal.
Mtr Open 1st of Month	0 Gal.
RO Cum Water	0 Gallons
Pipe line H2S PPM	0 PPM
Sales Gas H2S	0 PPM
Sewage Chlorine Residual To Ocean	4 PPM
Sewage To Ocean	345 Gals
Total Cum Sewage	5515 gals
HC Sump	0 bbls
Potable Water Chlorine Residual	1.5 PPM